

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

**NOTICE OF VOLUNTARY
DISMISSAL WITHOUT PREJUDICE**

Dave Pear, et al.
v. National Football League et al.
No. 2:12-cv-01025-AB

**As to Plaintiffs TIMOTHY BARNETT
And CHELONDA BARNETT Only**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(i), Plaintiffs Timothy Barnett and Chelonda Barnett hereby voluntarily dismiss their claims against all Defendants in the above-captioned actions, without prejudice. This notice of voluntary dismissal without prejudice in the above-captioned matter applies to Plaintiffs Timothy Barnett and Chelonda Barnett only. Their claims in *Albert Lewis, et al. v. Kansas City Chiefs Football Club, Inc.*, Case No. 2:14-cv-01995, remain pending.

None of the named Defendants in this action have filed or served an answer to Plaintiffs' Complaint, or a Motion for Summary Judgment.

Dated: June 25, 2015

Respectfully submitted,

GOLDBERG, PERSY & WHITE, P.C.

By: s/ Jason E. Luckasevic
Jason E. Luckasevic, Esquire
(PA Bar No. 85557)
1030 Fifth Avenue
Pittsburgh, PA 15219
Telephone: (412) 471-3980
Facsimile: (412) 471-8308
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2015 the foregoing Notice was electronically filed.
Notification of this filing will be sent to all parties via the Court's CM/ECF system.

GOLDBERG, PERSY & WHITE, P.C.

By: s/ Jason E. Luckasevic